



Department of Energy
National Nuclear Security Administration
Albuquerque Operations Office
Office of Kirtland Site Operations
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REC 1 5 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William P. Moats, Project Leader
SNL/KAFB Permits Management Program
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Reply to Request for Supplemental Information Concerning the Resource
Conservation and Recovery Act (RCRA) Closure Report for the Sandia National
Laboratories, New Mexico (SNL/NM) Interim Storage Site (ISS) and Summary
Sample Data Tables, EPA ID# NM 5 890 110 518-1

Dear Mr. Moats:

On behalf of the Department of Energy (DOE) and Sandia Corporation (Sandia), the enclosed report, RCRA Closure Report for the SNL/NM Interim Storage Site (Closure Report), January 2002, is being submitted to the New Mexico Environment Department (NMED). The submittal is in response to the Request for Supplemental Information (RSI) by the NMED. Sample data tables were not included in the original report, Closure Report dated August 2001, and they were requested to complete the documentation. Seven sample data tables documenting the ISS samples are now in the Appendix D to the Closure Report.

The tables include sample identification numbers and site sample numbers, analytical methods, units of measure, sample depths, analytes, results, detection limits, and data qualifiers. The site sample locations are shown on a map in the Closure Report. Additionally, the August 2001 Closure Report has been modified and a current copy is enclosed. The list of changes that were made to the report is enclosed as Attachment 1 to this letter. The due date for the response to the RSI is February 15, 2002.

If you have any questions regarding this Closure Report or Attachments, please contact Ron Dobbs of my staff at 845-4428.

Sincerely,



Michael J. Zamorski
Director
Office of Kirtland Site Operations

Enclosures:

RCRA Closure Report for the SNL/NM ISS, January 2002

Attachment 1: Summary of Modifications to the August 2001 Closure Report

cc w/enclosure:

W. Moats, NMED HWB
R. Kennett, NMED, MS 6133, 1396
E. Krauss, MS 0141, 11300
F. Nimick, MS 1087, 6132
D. Stockham, MS 1087, 6133
D. Moore, MS 1050, 3124

cc w/o enclosure:

J. P. Bearzi, NMED Chief, HWB

Attachment 1

Summary of Modifications for the *RCRA Closure Report for the SNL/NM Interim Storage Site (ISS)*, January 2002, Revision 2.0

After reviewing the RCRA Closure Report for the SNL/NM Interim Storage Site (ISS), August 2001, Revision 1.1, (Closure Report), the New Mexico Environment Department (NMED) Hazardous Waste Bureau (HWB) responded with a Request for Supplemental Information (RSI). The RSI specifies sample data to be presented in summary tables. While preparing the summary tables (Appendix D to the Closure Report), it was determined that some additional information should be added to the Closure Report for more complete reporting of data or for correction of data. The details of the modifications are listed below. The conclusions for the risk assessment were not changed by the additions of data and SNL/NM and the DOE request RCRA closure of the ISS.

Modifications to the RCRA Closure Report for the SNL/NM Interim Storage Site, August 2001, include:

- Global change of date to January 2002 and revision 2.0
- Addition of "plutonium-239" or "Pu-239" to narration descriptions containing the phrase "U-238, Pu-238 and H-3." Pu-238 was listed in previous reports and Pu-239 was added for more complete reporting (pages: iii, 5, 12, 23, 25, 29, and 32)
- Appendix B modifications:
 - Page ii: Table of Contents, page numbers made current
 - Page iii: List of Tables, add Table 18, HQs for Ecological Receptors Exposed to Background Concentrations at the ISS
 - Page iv: List of Abbreviations and Acronyms, deleted AOP and BCF
 - Page 3: added sentence "Ten of the 25 isotopic Pu-238 data results were over-ridden (rejected) by manual inspection of the data by analytical laboratory personnel due to radon interference."
 - Page 4: added " - = not applicable" to list of references
 - Page 7: Table 4, corrected maximum concentration for Barium from 94.7 to 135 mg/kg and changed "Yes" to "No" in fourth column (Barium information is added later in report), and changed Total Uranium from 0.196 to 0.582 mg/kg, due to units correction
 - Page 8: Table 5, Pu-239 data row added and added reference "Tharp (1999)."
 - Page 11: VI.4.1.2 Results, added discussion "one COC exceeded the background screening level."
 - Page 13: Table 7, added Barium data row
 - Page 14: Table 8, added Pu-239 data row
 - Page 15: VI.6.2, added "Table 10 shows that the HI was 0.00 while there was no calculated estimated excess cancer risk." (for Industrial Land-use Scenario), and added, "Table 10 shows that the HI was 0.02 while there was no calculated estimated excess cancer risk." (for Residential Land-use Scenario)
 - Pages 15, 17, 19: changed the incremental TEDE for residential land-use scenario from 7.0E-2 mrem/yr to 7.08E-2 mrem/yr

RCRA Closure Report for the SNL/NM Interim Storage Site, January 2002

- Page 16: Table 9 and 10, added Barium data rows, and modified Total data
- Page 17: VI.7 Step 6, modified to read "Assuming the industrial land-use scenario, the HI was 0.00 while there was no calculated estimated excess cancer risk." and modified to read "Assuming the residential land-use scenario, the HI was 0.02 while there was no calculated estimated excess cancer risk."
- Page 20, 21: VII.2.1 Data Assessment and VII 2.2 Bioaccumulation, Barium and Pu-239 added to lists
- Page 26: Table 12 and 13, Barium data row added
- Page 27: Table 14, Barium data row added
- Page 28: Table 15, Barium data row added, and added reference "aBold text indicates HQ exceeds unity.", and bolded some values
- Page 29: in first paragraph, in sentence "None of the analytes had HQs exceeding unity" added "with the exception of barium." Modified the last sentence in same paragraph to read "HIs exceeded unity for the omnivorous deer mouse and insectivorous deer mouse with a maximum of 2.3E+0 for the insectivorous deer mouse." Also inserted new discussion in second and third paragraphs under VII.3.5
- Page 30: Table 16 and 17, added Pu-239 data rows
- Page 31: added Table 18, "HQs for Ecological Receptors Exposed to Background Concentrations at the ISS"
- Page 32: added new second paragraph and deleted paragraph that began "Because all HQs and HIs calculated based upon the conservative assumptions used in the analysis were less than unity,...." Also, under VII.3.6 Risk Interpretation, deleted paragraph and inserted new paragraph. Also, under VII 3.7, modified existing sentences to read "With respect to this site, ecological risks are predicted to be low. The scientific/management decision is to recommend this site for no further action."
- Page 35: added reference "Tharp, T. (Sandia National Laboratories).

If you have any questions concerning the modifications, please call Darlene Moore at 844-2498.

Certification Statement for Approval and Final Release of Documents

To be used when a SNL Officer and NNSA must approve release

Document title and author: RCRA Closure Report for the SNL/NM Interim Storage Site,
January 2002, Darlene Moore, 3124

Certification of Accuracy

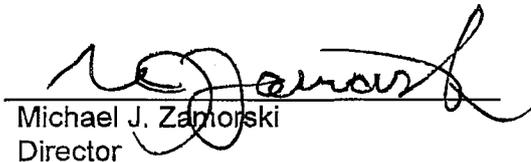
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather, evaluate, and prepare the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.



2/11/02
Date

Donald Blanton
Vice President
Human Resources and Protection Services
Sandia Corporation
Albuquerque, New Mexico
Co-Operator

and



2/15/02
Date

Michael J. Zamorski
Director
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Owner and Co-Operator

Document: ISS RCRA Closure Report
Revision: 2.0
Date: January 2002

RCRA Closure Report for the SNL/NM Interim Storage Site

Sandia National Laboratories/New Mexico